

The Honorable Brian A. Tsuchida

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,
Plaintiff,
v.
BENNETT S. PARK,
Defendant.

CASE NO. MJ23-564
COMPLAINT for VIOLATION
Title 18 U.S.C § 2251(a), (e).

Before the Honorable Brian A. Tsuchida, United States Magistrate Judge, United States Courthouse, Seattle, Washington.

The undersigned complainant being duly sworn states:

COUNT ONE

(Production of Child Pornography)

In or about May 2023, in Snohomish County, within the Western District of Washington, BENNETT S. PARK used, persuaded, induced, enticed, and coerced a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct and transmitting any live visual depiction of such conduct, and attempted to do so, knowing and having reason to know that such visual depiction would be transported and transmitted using any means or facility of interstate and foreign commerce, such visual depiction was transported and transmitted using any means or

1 facility of interstate and foreign commerce and in and affecting interstate and foreign
2 commerce, and such visual depiction was produced using materials that had been mailed,
3 shipped, and transported in interstate and foreign commerce.

4 All in violation of Title 18, United States Code, Section 2251(a), (e).

5
6 And the complainant states that this Complaint is based on the following
7 information:

8 I, Special Agent Alaina Dussler, being duly sworn under oath, depose and say:

9 **INTRODUCTION**

10 1. I am a Special Agent (“SA”) with the Department of Homeland Security
11 (“DHS”), U.S. Immigration and Customs Enforcement (“ICE”), Homeland Security
12 Investigations (“HSI”). I have held such a position since December 2021. HSI is
13 responsible for enforcing the customs and immigration laws and federal criminal statutes
14 of the United States. I am currently assigned to the Office of the Special Agent in Charge
15 (“SAC”), Seattle, Washington, and am a member of the Child Exploitation Investigations
16 Group. As part of my current duties, I investigate criminal violations relating to child
17 exploitation and child pornography, including violations pertaining to the illegal
18 production, distribution, receipt, and possession of child pornography and material
19 involving the sexual exploitation of minors in violation of 18 U.S.C. §§ 2251, 2252, and
20 2252A. I have also had the opportunity to observe and review examples of child
21 pornography (as defined in 18 U.S.C. § 2256(8)).

22 2. As part of my current duties as an HSI Criminal Investigator, I investigate
23 criminal violations relating to child exploitation and child pornography including
24 violations of Title 18, United States Code, Sections 2251(a), 2252(a)(2), 2252(a)(4)(B),
25 and 2243(a)(1). I have received training about child pornography and child exploitation,
26 and have observed and reviewed numerous examples of child pornography in various
27 forms of media, including media stored on digital media storage devices such as
computers, tablets, cellphones, etc. I am a graduate of the Criminal Investigator Training

1 Program (“CITP”), and the HSI Special Agent Training (“HSISAT”) at the Federal Law
2 Enforcement Training Center in Glynco, Georgia. I have participated in the execution of
3 previous search warrants, which involved child exploitation and/or child pornography
4 offenses, and the search and seizure of computers, related peripherals, and computer
5 media equipment. I am a member of the Seattle Internet Crimes Against Children Task
6 Force (“ICAC”), and work with other federal, state, and local law enforcement personnel
7 in the investigation and prosecution of crimes involving the sexual exploitation of
8 children.

9 3. The facts set forth in this Complaint are based on my own personal
10 knowledge; knowledge obtained from other individuals during my participation in this
11 investigation, including other law enforcement officers; review of documents and records
12 related to this investigation; communications with others who have personal knowledge
13 of the events and circumstances described herein; and information gained through my
14 training and experience. I have not set forth all facts known to me as a result of this
15 investigation but only those facts I believe necessary to establish probable cause to
16 conclude that BENNETT S. PARK committed the offense charged in this Complaint.

17 **SUMMARY OF THE INVESTIGATION**

18 4. As described below, I believe that BENNETT S. PARK enticed M12, an
19 identified minor around the age of 12, to produce images of child sexual abuse material
20 (CSAM) and send that imagery to him over the internet. My investigation has revealed that
21 PARK met M12 through Instagram in May 2023 and remained in contact with M12 until
22 early June 2023.

23 5. This investigation arose from an undercover chat investigation that began in
24 July 2023. The investigation targeted people with a sexual interest in children by posting
25 advertisements on various online social media platforms. On or about July 7, 2023,
26 someone with the profile name “icon0clash” responded to an ad which an undercover agent
27

1 (UC) had posted reading: “*Single mom with 2lils bored @ home.*” Agents later identified
2 this person as PARK.

3 6. In chats with the UC, PARK said he was sexually attracted to young girls
4 and was interested in meeting with the UC’s 7 and 10-year-old daughters. PARK also
5 claimed he had previously been sexually active with children ranging in ages from 11 to
6 17 years old. PARK described what he wanted to do with the UC’s children and said, “I
7 want to dress her up in a cute outfit, touch her legs, her body, and maybe finger her,” “Rub
8 my cock on her little cunt, not penetrate,” and “Teach her how to make me cum.” PARK
9 also told the UC that he had recently initiated a sexual relationship with a 17-year-old and
10 had filmed their sexual activity.

11 7. In early August while the UC and PARK were discussing a possible date to
12 meet, PARK said he may meet up with a 13-year-old who has since been identified as M1.
13 PARK said he met M1 on Discord. He said M1 sent him photos and gave him her home
14 address. When the UC asked what PARK wanted to do with M1, he said, “Touch her little
15 body, finger her, make her suck my cock, bend her over, rub my cock on her, maybe put it
16 in her,” He also said he was “*going to take pics and vids too.*” PARK told the UC he
17 planned to pick up M1 at midnight on August 8, 2023, when M1 would be able to sneak
18 out of her house.

19 8. Law enforcement began surveilling PARK in the evening on April 7. PARK
20 left his Snohomish County home around 11:30 pm and drove to a residential area in Everett,
21 Washington. Around 1:45 am on April 8, M1 approached PARK’s car and got inside. Law
22 enforcement intervened and arrested PARK. Police confirmed M1’s identity and age—13.
23 PARK was released after being processed, and Snohomish County is reviewing the case
24 for possible criminal charges.

25 9. Records from Discord obtained through a search warrant included messages
26 between PARK and M1. These messages included plans for their August 8 meeting and
27 messages indicating PARK’s sexual interest in M1.

1 10. Between August and October 2023, HSI Seattle received 13 NCMEC
2 CyberTips from Discord and Instagram believed to be associated with PARK in which
3 those providers identified possible child exploitation conduct. CyberTip report 171114389,
4 for example, identified five Instagram accounts associated with PARK as well as excerpts
5 of an Instagram message thread from May 2023 in which PARK appeared to message
6 another child, who has since been identified as M12. Although the DOB listed on M12's
7 account indicated a birth year of 1984, her publicly visible Instagram bio indicated M12 is
8 12 years old. Instagram noted in CyberTip 171114389 that the account PARK used to
9 contact M12 was also associated by device and IP addresses to a Facebook account for
10 Bennett Sung PARK and the Facebook account listed a birthdate that matches PARK's. A
11 selfie style photo sent to M12 also appears to resemble PARK and a sexually explicit video
12 sent to M12 includes a male voice that matches PARK's voice.

13 11. PARK's initial messages to M12 demonstrate he was aware of her age: "I
14 like that you're 12 :)))". Throughout the conversation M12 sent multiple CSAM files to
15 PARK and PARK repeatedly responded positively to the images and asked for more.
16 Instagram also submitted CyberTip 170833958 and included approximately 20 CSAM files
17 that appear to be self-produced by M12 and sent to PARK in May 2023.

18 12. In October 2023, I obtained Instagram records in response to a search warrant
19 seeking records for accounts associated with M12 and PARK. Throughout the messages
20 between M12 and PARK, PARK repeatedly told M12 she should not tell anyone about him
21 talking to her and acknowledged M12's age during their sexually explicit chats. For
22 example, PARK and M12 had the following exchange:

23 PARK: I can't wait to dick you down. My sweet little 12 year old princess, Your
24 tight little 12 year old cunnie, I can't wait to feel it around my big hard cock, and
25 stretch you...

26 M12: im so smol and tight:3
27

1 PARK: To hear you cry and whimper while I rape you, I know, princess, My cock
2 might be too big for your tight little 12 year old cunnie.

3 13. PARK also repeatedly mentioned a plan to visit M12, who lives outside
4 Washington, and have sex with her in a hotel.

5 14. PARK repeatedly asked M12 to send him sexually explicit imagery of herself
6 and provided specific directives about what he wanted her to do. Below is a chat excerpt
7 between PARK and M12 from May 12, 2023:

8 PARK: Now why dont you show daddy your tight little cunnie

9 PARK: Sends an attachment. [Note: attachment is not visible in the records provided
10 from Instagram.]

11 PARK: Come suck daddy's cock like a good little slut princess

12 M12: [M12 sends an image titled **"unified_message_208076178677971.jpg"**
13 which shows a close-up image of a female child's vagina. The child's legs appear
14 to be raised up to expose the vagina and anus. The focus of the image is on the
15 child's genitals and the child's face and upper body are not pictured. A gray-striped
16 bed sheet is on the child's bed and a pink blanket with black and multi-color pattern
17 is pushed to the side of the bed. The image quality appears to be slightly out of
18 focus. Based on the child's size and lack of pubic hair the child appears to be
19 approximately 12-14 years old.]

20 PARK: Look at that tight little cunnie and cute little butt, princess

21 M12: [M12 sends an image titled **"unified_message_267094579092241.jpg"**
22 which shows a similar image described above in the previous file sent. The same
23 bedding is visible in the image as previously described and the child is in the same
24 pose with their legs raised to expose their vagina and anus. The image appears to be
25 slightly out of focus but shows the child has possibly very early stages of pubic
26 hair.]
27

1 M12: [M12 sends an image titled “unified_message_1424071998462732.jpg”
2 which shows another similar image described above as the same bedding is visible
3 in the image as previously described and the child appears to be in a similar pose
4 with their legs raised. The child appears to be holding one of their buttocks to expose
5 their anus and vagina. The image appears to be slightly out of focus but shows the
6 child has possibly very early stages of pubic hair.]

7 PARK: Sends an attachment. [Note: the file sent is not visible in the records
8 provided by Instagram.]

9 PARK: Good girl

10 PARK: Fuck

11
12 15. The following chats occurred on May 15, 2023:

13 PARK: Maybe you can sneak a pic of yourself at school for daddy

14 M12: yesh :3

15 PARK: Take a pic for daddy at school, princess

16 PARK: Make me horny for my sweet little schoolgirl princess

17 PARK: Make me want to kidnap you after school

18 M12: hehe okay daddy i will send u stuff

19 PARK: Good girl

20 ***

21 PARK: Why don't you be a good girl and show daddy what panties you're wearing
22 today to school, princess

23 PARK: Take a pic for daddy when you're in the bathroom

24 M12: but daddy im not wearin any

25 PARK: Good girl :))

26 PARK: Daddy still wants you to take a pic in the bathroom. Show daddy your tight
27 little girl cunnie

1 M12: okii

2 PARK: I've been stoking my cock looking at your pics and thinking of you, princess

3 M12: daddy im so wet:<

4 PARK: That's a good little slut for daddy

5 PARK: Let daddy unbutton your jeans and finger your, princess

6 M12: [M12 sends an image titled "**unified_message_806491837143186.jpg**"
7 which shows a female child's exposed vagina. No other part of the child is visible
8 in the image. The child appears to have early pubic hair development. It is difficult
9 to discern the child's age based solely on the pubic hair development but I would
10 estimate the child to be approximately 12-14 years old.]

11 PARK: Good girl

12 PARK: Look at that tight little 12 yr old cunnie

13 ***

14 PARK: Also, I want you to take pics in your cutest sockies and panties for daddy

15 PARK: When you're alone

16 PARK: One cute pose and one slutty pose

17 M12: oki :D

18 PARK: Or multiple

19 M12: i will take alot for uuu

20 PARK: Your cutest sockies and panties, princess

21 PARK: Good girl

22 PARK: I'm very excited to see

23 ***

24 M12: daddy can i touch myself pwease

25 PARK: Yes you may, princess

26 PARK: But take a video, with sound, and show me

27 PARK: Also, don't forget the pics daddy wanted, princess

1 M12: oooh okey daddy

2 PARK: Good girl

3 M12: [M12 sends 8 images, two of which are described as follows:

4 “**Unified_message_2149040762390062.jpg**” shows a female child sitting in
5 a slightly reclined position on the floor wearing a pink shirt, pink polka-dot
6 underwear, and blue socks with a cartoon face stitched on them. The child’s
7 underwear is pulled down to her thighs and her legs are bent at the knees with
8 her legs spread to expose her vagina. The child’s shirt is also pulled up to
9 expose her breasts. The child is looking at the camera and sticking her tongue
10 out. Based on the child’s size and stature, lack of visible pubic hair, breast
11 development, and youthful features, it appears the child is approximately
12 between 12-14 years old.

13 “**Unified_message_569164115337734.jpg**” shows the same female child as
14 the previous image, in the same clothes as previously described, sitting in a
15 slightly reclined position on the floor. The child’s underwear is pulled down
16 to her thighs and her legs are bent at the knees with her legs spread to expose
17 her vagina. The child’s shirt is also pulled up to expose her breasts. The child
18 is looking at the camera with a slight smile. Based on the child’s size and
19 stature, lack of visible pubic hair, breast development, and youthful features,
20 it appears the child is approximately between 12-14 years old.]

21 ***

22 PARK: You’ll need to be wet for how hard I’m going to fuck you’re tiny little holes,
23 princess

24 PARK: I’m going to fuck every little pretty hole on your pretty little body

25 PARK: Your pretty little princess mouth

26 PARK: Your tight little cunnie

27 PARK: Your cute little kiddie butt

1 PARK: I'm going to make a mess of you, little girl

2 M12: daddy my finger isnt big enough i need you rn

3 PARK: That's why I'm going to come kidnap you, and make you my dirty little 12
4 yr old cum slut

5 PARK: I'm planning to fly out there at the end of May, princess. And I'm going to
6 rent a car and a motel room.

7 PARK: So I can kidnap and rape you

8 PARK: Maybe May 29-May 30

9 M12: [M12 sends a video file titled "**unified_message_180092141660434.mp4**". The
10 file is one minute in duration and shows a female rubbing and digitally penetrating
11 her exposed vagina. The video is closely focused on the vagina, so no other body
12 parts or face of the female is visible.]

13 PARK: After school ok those days

14 M12: yesh

15 PARK: Good girl


16 PARK: You did what daddy asked for

17 16. On August 31, 2023, law enforcement executed a search warrant at PARK's
18 home in Snohomish County and seized several electronic devices. During a recorded
19 interview but before being advised of his rights, PARK said, "I do want to talk to you, I
20 do, I just, I know I have problems." Agents then advised PARK of his *Miranda* rights and
21 provided an overview of the investigation. PARK responded, "If I'm in your custody, I'd
22 like to help as much as possible and help repair whatever problems I may have caused. You
23 know, uh, I have no choice but to dedicate my life to that going forward, just in general. I
24 understand everything you've told me, and it's hard to explain oneself." PARK then
25 invoked his rights, adding, "It's not that I don't want to help repair any damage, I would
26 like to follow my lawyers advise just in the interest of minimizing whatever consequence
27 I may have to pay."

17. Forensic analysis of PARK's digital media and review of data obtained from various electronic service providers is ongoing. Thus far, HSI has identified 23 apparent minors that PARK has communicated with over the internet since April 2018. Their ages range between 10 and 17 years old. Many of the communications are sexually explicit and include requests from PARK that these minors model for him and/or send him photos. The chat messages indicate that PARK has also met at least 5 of these apparent minors, whose ages range from 13 to 17 years old, with the intent of engaging in sex.

CONCLUSION

18. Based on the above facts, I respectfully submit that there is probable cause to believe that BENNETT S. PARK, committed the offense(s) charged in this Complaint.


ALAINA DUSSLER, Affiant
Special Agent, HSI

The above-named agent provided a sworn statement attesting to the truth of the contents of the foregoing affidavit on this 22nd day of November, 2023.


BRIAN A. TSUCHIDA
United States Magistrate Judge